

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

<p>Andrew B. Austin, Plaintiff, v. LexisNexis Risk Solutions Inc., Defendant.</p>	<p>Case No.: 23-cv-00869-JMB-JFD</p> <p>JOINT STIPULATION AND MOTION TO EXTEND COURT CASE DEADLINES BY FORTY-FIVE DAYS</p>
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Plaintiff Andrew B. Austin and Defendant LexisNexis Risk Solutions Inc., by and through their respective undersigned counsel, jointly stipulate and request under Federal Rule of Civil Procedure 16 and Local Rule 16.3(b) that the Court amend its January 31, 2024, Second Amended Pretrial Scheduling Order by extending all deadlines 45 days as provided below.

Under Local Rule 16.3(b), a party moving to modify a scheduling order must “establish good cause for the proposed modification; and (2) explain the proposed modification’s effect on any deadlines.” D. Minn. LR 16.3(b)(1-2). Good cause exists to modify this Amended Scheduling Order. Following the previous January 31st Order Defendant served its supplemental production on February 17, 2024. Upon receipt of the production by Defendant LexisNexis Plaintiff made the required settlement demand on March 20, 2024. Since that time the parties have been diligently conducting settlement discussions. Plaintiff has only two depositions needed to complete discovery; Defendant has one. Plaintiff served Defendant with deposition notices on March 20, 2024, setting

those depositions for March 27th and March 28th, 2024. Due to holiday travel and other pressing matters Defendants informed Plaintiff on March 26, 2024, that it would not be able to appear on those dates and stated that they would not oppose moving the discovery deadline to accommodate the depositions. In addition, the parties have secured May 9, 2024, at 1:00 p.m. for a settlement conference. The original settlement conference had been scheduled for October 19, 2023, but it was eventually canceled.

To this end, the Parties move to extend all the Court deadlines by thirty days to accommodate the parties' depositions.

The current deadlines the parties seek to extend are as follows. *See Doc. No. 31.*

- a. Fact Discovery Completion Deadline: April 1, 2024, to May 15, 2024.
- b. Non-Dispositive Motion Deadline to Serve and File: May 1, 2024, to June 14, 2024.
- c. Dispositive Motion Deadline to Serve and File: June 15, 2024, to July 15, 2024.
- d. Trial Ready Date: August 15, 2024 – remains subject to the Court's preference.

Should the Court wish for more details, the Parties are amenable to a conference to discuss the matter further.

For the reasons stated above, and in the interest of judicial economy, the parties therefore respectfully ask the Court to:

- Extend the current case deadlines by up to forty five days save and except the Trial Ready Date as indicated above.

CONSUMER JUSTICE CENTER, P.A.

Dated: March 29, 2024

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